

April 23, 2021

**VIA ELECTRONIC FILING
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The Honorable Analisa Torres
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Bilalov v. Gref & Sberbank CIB USA, Inc.*, No. 20-CV-09153 (AT) (KNF)

Dear Judge Torres,

This firm represents Defendant Sberbank CIB USA, Inc. (“SCIB”) in the above-captioned matter. Together with Debevoise & Plimpton LLP, which represents Defendant Herman Gref, we respectfully submit this letter pursuant to Rule I.C of Your Honor’s Individual Practices to seek an extension of Defendants’ time to respond to the Amended Complaint in these proceedings to May 21, 2021.

Defendants contend that they were not served effectively under Rule 4 of the Federal Rules of Civil Procedure, but will agree to waive service with Plaintiff’s agreement to extend Defendants’ time to answer, move, or otherwise respond to Plaintiff’s Amended Complaint (including by way of pre-motion letter in accordance with Rule III.B.iii of Your Honor’s Individual Practices) to a date within the time to answer had Defendants waived service of process under Fed. R. Civ. P. 4(d)(3). The parties have agreed to a deadline to answer of May 21, 2021, which (among other things) is less than 90 days from Defendant Herman Gref’s time to answer had he agreed to waive service on March 10, 2021, the date of the putative service of process.

There has been one prior request to extend the time for Defendants to respond to the Amended Complaint to July 8, 2021, which Judge Fox denied on grounds that the parties had not provided a sufficient explanation for the requested extension.¹ The proposed extension to May 21, 2021 is considerably shorter. We thank the Court for its consideration.

¹ The parties initially proposed a 90-day extension because that is the amount of time that Mr. Gref, who is located outside of the United States, is entitled to after a waiver of service under Rule 4(d)(3). See Dkt. No. 25.

Respectfully submitted,

/s/ Kimberly A. Havlin

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Copies to Counsel of Record (via ECF Filing)